

Exhibit A

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15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.
25

Case No. 3:17-cv-00939-WHA

**NOTICE OF DEPOSITION OF
LARRY PAGE AND REQUESTS FOR
PRODUCTION OF DOCUMENTS
AND THINGS**

Honorable William Alsup

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30,
3 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, by and through
4 their attorneys, will take the deposition upon oral examination of Larry Page. The deposition will
5 commence at 10:00 a.m. on April 27, 2017, at the offices of Morrison & Foerster LLP,
6 425 Market Street, San Francisco, California. The deposition will be taken by a notary public or
7 other authorized officer and will continue from day to day until concluded, or may be continued
8 until completed at a future date or dates.

9 PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Civil
10 Procedure 30(b)(3), the deposition will be videotaped and recorded stenographically.

11 PLEASE TAKE FURTHER NOTICE that pursuant to Rule 34 of the Federal Rules of
12 Civil Procedure, the deponent is requested to produce at the time and place set forth above for his
13 deposition the documents and things identified in the attached Exhibit A to Notice, which is
14 incorporated herein by reference.

15 Dated: April 20, 2017

MORRISON & FOERSTER LLP

17 By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

18 Attorneys for Defendants
19 UBER TECHNOLOGIES, INC.,
20 OTTOMOTTO LLC, and OTTO TRUCKING LLC
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EXHIBIT A

DEFINITIONS

1. “Waymo” means Waymo LLC, Google Inc., and Alphabet Inc.
2. “Defendants” mean Uber Technologies, Inc. (“Uber”) and Ottomotto LLC and Otto Trucking LLC (together “Otto”).

REQUESTS

1. Documents regarding any policy or written guideline regarding the ability of Waymo employees to participate in a personal side business while employed by Waymo.
2. Documents sufficient to identify the Waymo employees who have had side businesses, including the names of all such employees and the nature of the side businesses in which such employees engaged in the past three years.
3. Documents sufficient to show any joint interest or joint defense agreement that Waymo has entered into during the past three years.
4. Communications about the possibility of pursuing a legal action against Anthony Levandowski or Defendants.
5. Any brief or declaration provided to any court in support of a joint interest or joint defense privilege asserted by Waymo.
6. Documents sufficient to show when Waymo began investigating the possibility of Anthony Levandowski taking Waymo files with him upon his departure.